CUMULATIVE INDEX

to

OIL & GAS TAX QUARTERLY

VOLUME XXXV: Nos. 1 to 4

CONTENTS

Subject Matter Index **I-2**

Table of Cited Cases **I-18**

Table of Cited Administrative Rulings **I-25**

Author Index **I-28**

SUBJECT MATTER INDEX

[References are to pages]

..A..

Absorption Costing
Refiner 142
Transfer Pricing 142

Accounting Rate of Return
Capital Projects 747
Helium 747

Active Income
Passive Losses 390

Alternative Minimum Tax
Adjustments to Income 412
Contracts 413
Financial Accounting 417
General 394, 409, 444
Intangible Drilling Costs 425
Minimum Tax Credit 429
Tax Preference Items 425

Alternative Valuation Date
Mineral Extraction 73
TRA of 1984 75

Alternative Book Value Test
FIRPTA 64

At-Risk Limitation
Partnership 217, 621

Audit
Financial Statement Analysis 718
Internal Control 734
Oil and Gas Specific 733
Procedural Considerations 737

Average Daily Production
Stripper Wells 17

..B..

Bankruptcy
Reorganization 658

Barrel Limitation
Average Daily Production 17
Depletion 27

Boot
Reorganization 649, 671, 688, 691, 707

..C..

Capital Account
Deficits 201
Qualified Income Offset 202
Special Allocations 197

Capital Gains
TRA of 1986 ..... 490, 655

Cased Shafts
Depletion 178
Depreciation 178

Computer
Financial Ratio Analysis 720
Reflex 723

Contracts
Alternative Minimum Tax 413
Convertible Override 256
Deed 246
Economic Out Clause 117
Farm-out Arrangement 258
Futures Contracts 347
Lease Expiration 585
Perpetuities 238

Contingent Liabilities
Reorganization 699

Convertible Overrides (See Contracts)
Background 239
Definition 238

Constructive Ownership
FIRPTA 62

Cost Depletion (See Depletion)

Costs
Development 131
Direct 142
Economic 44

Costs—Cont.

Exploration 131
Fixed 144
Oil Import Fee 44
Overhead Allocation 634
Variable 143

..D..

Deed
Convertible Override 246

Deficits
Capital Accounts 201

Depletion
Alternative Minimum Tax 423, 425
Capital Accounts 199
Cased Shafts 178
Cost 586
Gross Income 285
Intangible Drilling Costs 183
Lease Bonus 586
Percentage Depletion 387, 397, 446, 569, 586, 633
Restoration of Depletion 587

Depreciation
Alternative Minimum Tax 412, 422
Cased Shafts 178
Improvements 179
Lease Equipment 387
Pipelines 189
Special Allocations 195
Tax Reform Act of 1986 387
Tunnels 189
Waterwells 187
Well Equipment 387
Working Interest 178

Direct Costing
Refiner 142
Transfer Pricing 144

Dividend
Deduction 506
ESOPs 506
Stock Dividend 81

Dry Hole
Passive Losses 606

..E..

Economic Effect (See Special Allocations)

Economic Out Clause
Financial Statements 115, 117
General 117
High-Cost Natural Gas 115
Litigation 120
Pipeline Company 115
Tax Effects 115

Economic Recovery Tax Act of 1981
Stripper Well Property 14, 15

Embargo
OPEC 40, 124, 133, 226

Energy Consumption Tax
Conservation 96
Energy Intensive Products 88
Externalities 89
General 84
Investment Incentive 87
Rates 91
Social Cost 89
Tax Base 91

Encumbered Property
General 259
Tax Reform Act of 1976 263
Tax Reform Act of 1984 264

Enhanced Recovery Methods
General 462
Intangible Drilling Costs 461, 466

Equity Kicker Loans
FIRPTA 57

ESOPS
Acquisition Loans 507
Contributions 512
Distributions 509, 517
Dividends Deduction 504
Estate Tax Exclusion 504
Excise Tax 516
Gains 515
Investment Diversification 513
PAYSOP Credit 513
Put Options 511

Estate Tax
Alternative Valuation Date 73
ESOPs 504
Gross Estate 74
'In Place' Value 78
Mineral Interest 78
Mineral Production Income 78
Perpetuities 238
Possible Valuation Dates 75
Stock Dividend 81

Exploration and Development
Costs 131
Financial Accounting 122
Full Costing 123
Reserve Recognition Accounting 131, 134
SEC 131
Small Producers 125
Successful Efforts 124

..F..

Farm Out
Convertible Override 238
Standard 258

Fee Interest
Convertible Override 239

Field Price Method
Mining 285

Financial Accounting
Alternative Minimum Tax 417
Economic Consequences 122
Economic Out Clause 117, 118
Energy Policy Conversation Act of 1975 ..... 124, 132, 133
Exploration and Development Costs 122, 131, 134
Full Costing 123, 397
Futures Contracts 347
Interest Expense 636
Investment Tax Credit 351
Politicization 122
Reserve Recognition Accounting 131, 134, 548
Software 355
Successful Efforts 124, 397

Fixed Cost (See Costs)

Financial Statement Analysis
Accounting Rate of Return 747

Financial Statement Analysis—Cont.
Data Base 721, 728
General 718
Internal rate of Return 747
Reflex 723

FIRPTA
Alternative Book Value Test 64
Associated Personal Property 54
Co-Ownership 61
Commissions 60
Common Business Interest 57
Constructive Ownership 62
Creditor Interest in U.S. Real Property 57
Determination Dates 66
Domestic Corporation Election 68
Equity Kicker Loans 57
General 50
Goodwill 61
Improvements to Real Property 53
Indexed Interest Rates 59
Installment Obligations 58
Natural Deposits 52
Penalties 65
Reporting Requirements 50
Stock Interest 56
U.S. Real Property Holdimg Company 60
U.S. Real Property Interest 51
Withholding Requirements 50

Full Costing
Exploration and Development 123, 397

Futures Contract
Financial Accounting 347
Gain or Loss 347
Hedging Requirements 348

..G..

Goodwill
FIRPTA 61

General and Administration Expenses
Capitalization 389

Gross Income
Alternative Methods 291
Depletion 285
Field Price Method 285

Gross Income—Cont.
Proportionate Profits Method 287
Windfall Profit Tax 633

..H..

Heavy Oil
Windfall Profit Tax 20

Hedging Contracts (See Futures Contracts)

Helium
History 293, 745
Rate Base Valuation 749
Workback Method of Valuation 292, 746, 749

..I..

Imports
Oil Import Fee 43
Production 37

Independent Producer
Barrel Limitation 27
Definition 25
Windfall Profit Tax 25

Installment Obligations
FIRPTA 58

Intangible Drilling Costs
Alternative Minimum Tax 425
Depletion 183
Enhanced Recovery Methods 461
Expensing 239
Nature of 185
Prepaid 394
Special Allocations 195
Tax Reform Act of 1986 ..... 386, 447
Vertical Integration 386
Water Wells 187

Interest Expense
Deductibility 636
Indexed 59
Rates 59
Windfall Profit Tax 632

Internal Controls
Auditing 734

Internal Rate of Return
Capital Project 747
Helium 747

International Energy Agency
Oil Production 38

Investment Interest
Deduction Limitation 392

Investment Tax Credit
Effectiveness 318
Financial Accounting 351
General 318
TRA of 1986 388

..L..

Lease Bonuses
Depletion 586
Restoration of Depletion 587

Liabilities
Contingent 699
Reorganization 699
Undisclosed 699

Litigation
Economic Out Clause 120

..M..

Managerial Accounting
Absorption Costing 142
Contribution Margin 142
Direct Costing 142
Fixed Costs 144
Transfer Pricing 136
Variable Overhead Costs 143

Material Participation
Passive Losses 601

Mexico
Oil Exports 32

Multinational Business Firms
Accounting Needs 518
International Accounting 519
Taxation Needs 518

..N..

Non-Recourse Debt
Partnership....210, 212

..O..

Oil Import Fee
Economic Costs....44
Effects On Imports....43
Effect On World Price....42
Executive Order....44
Flat Dollar Fee....42
GNP....45
Impact On Friendly Importer Nations....46
Regional Effects....45
Superfund....614
Trade Expansion Act of 1962....44
Types of....42
Variable Import Fee....43

OPEC
Embargo Effects On U.S. 40, 124, 133, 226
Energy Policy and Conservation Act of 1975 ....125, 132, 133
Proven Oil Reserves....38
Saudi Arabia....31, 33
Venezuelan Proposal....33

Options
ESOP's....511
Perpetuities....245
Puts....511

Overhead Allocation
Windfall Profit Tax....634

..P..

Partnership Basis
Calculation....208, 265
Contributions of Encumbered Property....259
Guarantee On Non-Recourse Debt....210, 212

Partnership Losses
Adjusted Basis Limitations....208
At-Risk Limitations....217, 621
General....207, 450
Passive Losses....390, 600

Passive Losses
C Corporation....628

Passive Losses—Cont.
Dry Hole 606
General 390, 450, 600, 621
Oil and Gas 602
Material Participation 601
S Corporations 391, 603

PAYSOP Credits
Repeal 513

Percentage Depletion (See Depletion)

Perpetuities
Convertible Production Royalties 238, 256
Definition 241
Farm-Out Arrangement 258
Purpose of Rules Against 252
Right of First Refusal 245
Options 245
Wait and See Rule 251

Pipelines
Companies 115
Depreciation 189

Proportionate Profit Method
Mining 287

Portfolio Income
Passive Losses 390

Price Squeezing
Oil Production 284

Property
Allocation of Cost 178
Cased Shaft 178
Concepts 389, 398
Depletion 177
Depreciation 177
Direct Costs 400
Disposition 388, 606
DOE Definition 1, 2, 398
Encumbered 259
Enhanced Recovery Methods 461
High-Cost Natural Gas 115
Improvements 179
Indirect Costs 403
IRS Definition 2, 398
Mineral Interest/Estate Tax 78
Newly Discovered Crude Oil 21

Property—Cont.
Oil Producing Well....15, 183
Producing Formation....9
Reservoirs vs. Geological Formations....9
Right To Produce....2
Separate Reservoir Properties....8
Separate Royalty Owner Accountability....11
Separate Severance Tax Accountability....12
Stock Dividend....81
Stripper Well Property....14
Subdivision of Property....2
Sulphur....111
Transfer To Passive Activities....604
Unitized Properties....9
Utility Value....190
Very Large Tracts....13
Water Wells....187

Proven Oil Reserves
Oil Import Fee....38
Production....36
SEC....183, 192

..R..

Refiner
Absorption Costing....142
Direct Costing....142
Transfer Pricing....136
Windfall Profit Tax....26

Refinery
Utilization....48

Real Property
FIRPTA....51, 53
Holding Company....60

Reflex
Computers....723

Reorganizations
Acquisitive....671
Bankruptcy....658
Boot Relaxation Rule....649, 671, 688, 691, 707
Contingent Liabilities....699
Dissenting Shareholders....700
Distribution Requirements....666
Donald E. Clark Case....497
General....489, 645

Reorganizations—Cont.
History 491
Percentage of Net Worth Differential 704
State Law 656
TRA 86 ..... 661, 663, 666
Type A 662 672
Type C 662, 663, 672, 675
Type F 657
Undisclosed Liabilities 699
Unwanted Properties 695

Reserve Recognition Accounting
General 131, 134
Need For 548

Restoration of Depletion
Lease Bonuses 587

Rig
Decline 34

Royalties
As Compensation 484
Interest 484
Lease Expiration 585

..S..

Saudi Arabia
Oil Import Fee 31, 33

S Corporations
Passive Losses 391, 603 608

Securities and Exchange Commission
Energy Policy and Conservation Act of 1975 123-125
Exploration and Development Costs 131
Proven Reserves 183, 192
Valuation Information 548
Water Wells 187

Severance Tax
Penalties 113
Producer defined 112
Rates 112
Reporting Requirements 113
Sulpher 111
Texas 111
Windfall Profit Tax 12

Smaller Producers
Exploration and Development Costs 125
TRA 1986 436

Special Allocations
Capital Accounts 197
Conditions For 196
Depreciation 195
General 194
IDC 195
Partnerships 194

Strategic Energy Reserve
Oil Production 39

Stripper Well Property
Average Daily Production 17
Falling Prices, Effect 231
IRS Definition 15
Maximum Feasible Rate of Production 17
Maximum Total Production 17
Not Significantly Curtailed 17
Once A Stripper Always A Stripper 19
Recognized Conservation Practices 17
"Some Oil" Tests 16
Tax Reform Act of 1986 19
Windfall Profit Tax 14

Successful Efforts
Exploration and Development 124
Financial Accounting 124, 397

Sulphur
Severance Tax 111

Superfund
Excise Tax 611
General 611
LUST 614
New Legislation 610
New Program Provisions 615
New Tax Provisions 612
Oil Import Fee 613

..T..

Tax Reform Act of 1984
Alternative Valuation Date 75
Encumbered Property Contributions 264

Tax Reform Act of 1986
Alternative Minimum Tax 394, 409
Capital Gains 490, 655
Corporate Overview 436
Depletion 387
Depreciation 387
Disposition of Property 388
Dividend Deduction 491
Effects on 385
ESOPS 504
General and Administration Expenses 389
Intangible Drilling Costs 386
Investment Interest Limitation 392
Investment Tax Credit 388
Newly Discovered Crude Oil 25
Passive Losses 207, 390, 599
Reorganizations 647, 661, 663, 666
Stripper Well 19

Tax Preference Items
Alternative Minimum Tax 425
Depletion 423, 425
Depreciation 412, 422

Technical Correction Act of 1982
Windfall Profit Tax 26

Texas
Severance Tax 111

Timber
FIRPTA 52

Transfer Pricing
Absorption Costing 142
Contribution Margin 142
Direct Costing 142
Fixed Costs 144
Refiner 136
Variable Overhead Costs 143

Tunnels
Depreciation 189

..U..

U.S. Oil Production
Effect of Low Prices 34, 329
Enhanced Recovery 36
Imports 37
International Energy Agency 38

U.S. Oil Production—Cont.
Needed Investments....226
Operational Rig Decline....34
Price Controls....225
Production....36
Proven Reserves....33
Refinery Utilization....48
Strategic Energy Reserve....39

..V..

Valuation
Alternative date....73
Book Value....64
Estate Tax....73
SEC....548

Variable Import Fee
(See Oil Import Fee)

Variable Overhead Costs
Transfer Pricing....143

Venezuela
Oil Import Fee....33

Vertical Integration
Controversy Over....282
Intangible Drilling Costs....386
Percentage Depletion as Incentive....279, 282, 284
Windfall Profit Tax....275

..W..

Wait and See Rule
Perpetuities....251

Water Wells
Depreciation....187

Windfall Profit Tax
Depletion....178
Depreciation....178
Effect of....227
Fee Interest, Subdivision of....3
Heavy Crude Oil....20
Independent Producer....25
Interest Expense....632
Loss Tax Credit....224, 232
Newly Discovered Crude Oil....21
Non-contiguous Tracts....13

Windfall Profit Tax—Cont.
Oil Producing Well 15
Overhead Allocation 634
Producing Formation 9
Property Definition 1, 2
Reservoirs v. Geological Formations 9
Right to Produce 2
Separate Reservoir Properties 2
Separate Royalty Owner Accountability 11
Separate Severance Tax Accountability 12
Single Fee, Subdivision of 3, 6
Stripper Well 3, 6, 14
Subdivision of Property 2, 3, 6
TRA of 1986 ..... 19, 448
Unitized Properties 9
Vertical Integration, Incentive 13
Very Large Tracts 13

Working Interest
Depletion 178
Depreciation 178
Estate Tax 79
Passive Loss Rules 391, 602
Separate Activity 606
Transfer to Passive Activity 604

Workback Method
Court Cases 296, 749
Critique 311
Deductions 303
General 746
Rate Base Valuation 749
Starting Point 298

TABLE OF CITED CASES

[References are to pages]

..A..

A.T. Jergins Trust
22 B.T.A. 551 (1931) 183

Abramson v. Comm.
86 T.C. 360 (1986) 215, 369

Albert W. Ziegler
23 B.T.A 1091 (1931) 183

Allison v. U.S.
701 F.2d 933 (Fed. Cir. 1983) 195

Anderson
40-1 USTC ¶ 9,479, 310 U.S. 404 (1940) 81

Ashland Oil, Inc. v. Phillips Petroleum Co.
364 F. Supp. 6 (1973) 297

Atlantic Richfield Company
11 DOE ¶ 83,027 (1984) 12

..B..

Bedford
325 U.S. 283, 45-1 USTC ¶ 9311 491

Block
T.C. Memo. 1980-554, 41 TCM 465 212

Brand
81 T.C. 821 (1983) 220

Brown
T.C. Memo 1980-267, 40 TCM 725 212

Brown v. Commissioner
58 AFTR 2d 86-5696, 799 F.2d 27
(USCA 2, 1986) 570

..C..

Chesa Peake and Ohio Railway Co.
64 T.C. 352 (1975) 189

Cities Service Oil Co. v. Sohio
345 F. Supp. 28 (W.D. Okla. 1972) 256

Consumers Natural Gas
30 B.T.A. 1263 (1934), aff'd. 78 F.2d 161 (2d Cir.),
Cert. denied, 296 U.S. 634 (1935) 399, 404

Crane v. Comm.
331 U.S. 1 (1947) 209

..D..

Delores Crabb
41 B.T.A. 686 (1940) 588

Donald E. Clark
86 T.C. 138 (1986) 490

Douglas v. Comm.
322 U.S. 279 (1944) 594

..E..

Egolf v. Comm.
87 T.C. 34 (1986) 373

Engle v. Comm.
84-1 USTC ¶ 9134 (Sup. Ct. 1984) 586

Erwin H. Haas
55 T.C. 43 (1970), acq. 1971-2 CB 2 184

Estate of Johnston
84-2 USTC ¶ 13,591 79

Estate of E.P. Lamberth
31 T.C. 302 (1858) 270

Estate of Schlosser
60-1 USTC ¶ 11,939, 277 F.2d 268
(3rd Cir 1960) 81

Exxon Corp. v. U.S.
547 F.2d 548 (Ct. Cl. 1976) 473

..F..

Francis Oil and Gas, Inc. v. Exxon Corp.
687 F.2d 484
(Temp. Emer. Ct. App. 1982) 11

Freede v. Commissioner
86 T.C. 340 (1986) 159

..G..

Gates Rubber Co.,
74 T.C. 1456 (1980), aff'd 694 F.2d 648
(10th Circuit, 1982) 186

Gilbertz v. U.S.
59 AFTR 2d 87-424, 808 F.2d 1374
(USCA 10, 1987) 760

Gulf Oil Corporation v. Comm.
86 T.C. 937 (1986) 162, 376

Gulf Oil Corp. v. Comm.
86 T.C. 115 (1986) 374, 574

Gulf Oil Corp. v. Federal Power Comm.
563 F.2d 588, 600 (3d Cir. 1977),
Cert. den. 434 U.S. 1062 (1978) 247

Grynberg v. Amerada Hess
342 F. Supp. 1214 (D. Colo. 1972) 250

..H..

Hamilton v. U.S.
687 F.2d 408 (Ct. Cl. 1982) 196

Hatt v. Walker
33 S.W. 2d 489 (Tex. Civ. App. Dallas 1930) 246

Hawthorne Oil & Gas
10 DOE ¶ 83,005 14

Hillsboro Nat'l. Bank, Bliss Dairy, Inc.
83-1 USTC 9229, 51 AFTR 2d 83-874
(S. Ct. 1983) 596

..J..

J.E. Leslie
(CA-2) 69-2 USTC 9540, 413 F.2d 636 640

James A. Lewis Engineering Co. v. Comm.
39 T.C. 482 (1962) 470

James A. Lewis Engineering Co. v. Comm.
339 F.2d 706 (5th Cir. 1974) 187

Johnston Estate
57 AFTR 2d 148, 827 (5th Cir. 1986) 73

..K..

Klepak v. Commissioner
Energy Resources Tax Reports, August 1983-May 1985
CCH ¶ 9036 25

Koziare v. Comm.
86 T.C. 999 (1986) 370

..L..

Long v. U.S.
57 AFTR 2d 86-1431 164

Long
71 T.C. 1 (1978) 216

Logan v. Comm.
86 T.C. 1222 (1986) 371

Louisiana Delta Hardwood Co. Inc.,
12 T.C. 576 (1949), aff'd, 183 F.2d 189 588

..M..

Maass
41-1 USTC ¶ 10,032 312 U.S. 443 77

Marathon Oil v. DOE
Energy Management (CCH) ¶ 26,201 (N.D. Ohio 1980) 18

Mary F. Waggoner
47 B.T.A. 699 (1942) 590

McCoy v. U.S.
58 AFTR2d 86-5943, 802 F.2d 762 (USCA 4, 1986) 573

Mollett, Hodkins & Clarke Co. v. Rochester
178 U.S. 373 (1900) 249

Monsanto Co.
86 T.C., 1232 (1986) 290

Murphy Oil Co. v. Burnet
287 U.S. 299, 11 AFTR 1095 588

..N..

Norfold Shipbuilding and Drydock Corp.
321 F. Supp 222 (E.D. Va. 1971) 189

Norris
260 S.W. 2d 676 (Tex. 1953) 80

Northern Natural Gas Co. v. Grounds
292 F. Supp. 619 (1968) 297

..O..

Orrisch v. Comm.
55 T.C. 395 (1970) 195

..P..

Page Oil Co.
41 B.T.A. 952 (1940) 187, 469, 471

Peveto v. Starkey
645 S.W. 2d 770, 772 (Tex. 1982) 246

Phelps v. Shropshire
254 Miss. 777, 183 So. 2d 158 (1966) 251

Phillips v. U.S.
233 F. Supp 59 (E.D. Tex 1954), aff'd 353 F.2d 739 184

PMK Petroleum Co.
22 B.T.A. 360 (1931) 183

Pritchett
85 T.C. 580 (1985) 221

Producer's Chemical Co. v. Comm.
50 T.C. 940 (1968) 467

..R..

Raphan
52 AFTR 2d 83-5987 (Ct. Cl. 1983),
reversed 55 AFTR 2d 85-1154 (CA-FC, 1985) 210, 211

..S..

Seneca Oil Co. v. DOE
712 F.2d 1384 (Temp. Emer. Ct. App. 1983) 22

Seth Campbell
41 T.C. 91 (1963) 589

Sidney Platt
18 T.C. 1229 (1952), aff'd 207 F.2d 697 184

Southern Natural Gas Co., v. U.S.
412 F.2d 1222 (Ct. Cl. 1969) 189

Southland Royalty Co. v. FEA
512 F. Supp 436 (1980).....18

Standard Oil Co. (Indiana)
68 T.C. 325, 347 and 350 (1977), acq. 1983-1 C.B. 1.....185

Stargill v. Comm.
T.C. Memo. 1987-86 761

Stephens County v. Mid-Kansas Oil & Gas Co.
113 Tex. 160, 154 S.W. 290 (1923) 246

Stonocrest
24 T.C. 659 (1955) 270

Swenson Land & Cattle Co., Inc.
64 T.C. 686 (1975) 640

..T..

Texaco, Inc.
11 DOE ¶ 82,548 (1983) 9

Texas Oil Co. v. Daughtery
107 Tex. 226, 176 S.W. 717 (1915) 246

Traders Oil & Royalty
21 FERC ¶ 62,082 12

True Jr. v. U.S.
57 AFTR 2d 86-1417, 629 F. Supp. 881 (DC Wyo., 1986) 571

Trustees of Casa View Assem. v. Williams
414 S.W. 2d 697 (Tex. Civ. App. 1967).....246

Tunnell v. U.S.
367 F. Supp. 557 (D. Del. 1973), vacated and remanded 512 F.2d 1192 (3d Cir. 1975), cert. den. 423 U.S. 893 (1975).....189

..U..

U.S. v. Cannelton Sewer Pipe Co.
364 U.S. 84 (1960) 286

U.S. v. Dakota-Montana Oil Co.
288 U.S. 459, 466, 12 AFTR 18, 21 (1983) 182

U.S. Operating Inc.
Energy Resources Tax Reports
August 1983-May 1985, CCH ¶ 9028 8

..W..

Walter H. Burkhardt
T.C. Memo 1977-167 184

Ward v. Commissioner
57 AFTR 2d 86-1012, 784 F.2d 1424 (USLA 9, 1986) 161

Weber v. Texas Co.
83 F.2d 807 (1936) 245

TABLE OF CITED ADMINISTRATIVE RULINGS

[References are to pages]

Announcements

84-59 597
86-79 364

General Counsel Memoranda

22730 470
31869 472
34015 ..... 468, 469
34167 470
34346 473
34805 473
36569 474
38976 475
39564 474
39581 762

Letter Rulings

7952161 591
8004129 639
8030124 646
8336088 26
8402013 482
8404012 212
8504005 212
8624023 365
8620025 367
8624028 365
8701058 765
8706018 764
8706065 764
8707015 765
8708053 765

Revenue Procedures

74-42, 1974-3 C.B. 496 291
77-37, 1977-2 C.B. 568 ..... 647, 684
83-35, 1983-1 C.B. 745 189
87-12, 1987-6 I.R.B. 27 763

Revenue Rulings

55-389, 1955-1 C.B. 276 639
58-231, 1958-1 C.B. 247 467
60-336, 1960-2 C.B. 195 589
66-348, 1966-2 C.B. 433 78
69-583, 1969-2 C.B. 41 ..... 187, 467, 471
70-414, 1970-2 C.B. 132 ..... 187, 467
71-317, 1971-2 C.B. 328 ..... 78, 82
70-414, 1970-2 C.B. 132 ..... 188, 189
70-596, 1970-2 C.B. 68 473
72-18, 1972-1 C.B. 740 638
73-537, 1973-2 C.B. 197 594
74-515, 1974-2 C.B. 118 492
74-516, 1974-2 C.B. 121 494
75-83, 1975-1 C.B. 112 495
75-137, 1975-1 C.B. 74 189
75-235, 1975-1 C.B. 97 188
77-136, 1977-1 C.B. 167 467
80-342, 1980-2 C.B. 99 475
82-17, 1982-1 C.B. 95 476
83-28, 1983-1 C.B. 113 657
83-46, 1983-1 C.B. 16 484
83-151, 1983-2 C.B. 105 ..... 210, 211
84-36, 1984-1 C.B. 143 290
84-82, 1984-1 C.B. 145 289
84-118, 1984-2 C.B. 120 216
86-119, 1986- C.B. 565
86-127, 1986- C.B. 565

Technical Advice Memorandum

8030116 656
8231009 24
8434004 9
8234010 24
8330001 26
8436004 10
8602003 26
8621002 366
8421004 220

8622005....364
8624008....366
8636001....566
8636003....566
8636006....570
8637124....569
8640006....567
8642010....568
8642052....569

AUTHOR INDEX

[References are to pages]

Alciatore, Mimi
Empirical Evidence of the Demand for RRA Oil Reserve Disclosures....548

Barton, Joe
Oil Import Fees and U.S. Energy Security....30

Bell, Timothy B.
Empirical Evidence of the Demand for RRA Oil Reserve Disclosures....548

Billings, Tony
Taxation and Financial Reporting Regarding the Economic-Out Clause....115

Blatz, Robert E.
Back from the Brink: Oil and Gas Tax Incentives Under the TRA of 1986....436

Bullard, Ruth Harper
Investment in the Oil and Gas Industry Today....620

Carlson, Rhonda
Expanding the Scope of Resource Materials for the Mineral Accountant....100

Cash, L. Stephen
How the Final 704(b) Regulations Affect the Oil and Gas Industry....194

Chandy, P.R.
The Stock Market's Reaction to Key Executive Death in the Oil Industry....533

Coyle, Kathleen A
Final Regulations for FITRPTA Code Section 897....50

Crumbley, D. Larry
Manipulating Gross Income from Mining By Integrated Mineral Firms....282

Cummings, Barbara K.
A New Audit Guide for Oil and Gas Producers....733

Davidson, W. N.
The Stock Market's Reaction to Key Executive Death in the Oil Industry....533

Deakin, Edward B.
The Property Concept in Mineral Accounting 397

Degnan, Theodore E.
Final Regulations for FITRPTA Code Section 897.....50

Derksen, Brian L.
The Tax Reform Act of 1986 As It Affects the Oil and Gas Industry.....385

Dickens, Thomas L.
How the Final 704(b) Regulations Affect the Oil and Gas Industry.....194
The Expanded Individual Alternative Minimum Tax and The New Corporate Alternative Minimum Tax.....409

Emig, James M.
Texas Severance Tax and Sulphur Production 111

Enis, Charles R.
Energy: A Potential Tax Base for Local Governments.....84

File, Richard G.
Deductibility of Interest Expense for Purposes of the Ninety Percent of Net Income Limitation for the Windfall Profit Tax 632

Finn, Don W.
The Importance of Transfer Pricing to Oil and Gas Companies ...136

Flinn, Ronald E.
C Reorganizations Under the Internal Revenue Code of 1986: More Tax Reform Needed?.....645

Ford, Phil J.
Passive Losses and Oil and Gas Operations.....599

Foshee, Andrew W.
New Superfund Legislation: Major Provisions, Revenue Sources, and Economic Incentives for Environmental Protection 610

Freigy, D. Steward
Investment in the Oil and Gas Industry Today 620

Gac, Edward J.
Expanding the Scope of Resource Materials for the Mineral Accountant 100

Gardner, Robert L.
Clark: Has the Tax Court Provided Clarification for the Treatment of Reorganization Boot 489

Garrison, Sharon
The Stock Market's Reaction to Key Executive Death in the Oil Industry.....533

Gill, Connie L.
Recent Developments in the Deductibility of Oil and Gas Partnership Losses 207

Goodman, Graig G.
Property and Producer Issues Under the WPT 1

Gordon, Gus
The Case for a Windfall Loss Tax Credit 224

Heck, J. Louis
Texas Severance Tax and Sulphur Production 111

Henderson, William, I.
Purchase of a Producing Oil and Gas Well: Is Cost of the Cased Shaft Recoverable Through Depreciation? 177

Hennessee, Patrick
The Tax Consequences of Exchanging Property Encumbered by Excessive Debt for a Partnership Interest 259

Hira, Labh S.
ESOP's: An Attractive Option for the Oil and Gas Industry 504

Klingstedt, John P.
Passive Losses and Oil and Gas Operations 599

Lassila, Dennis R.
U.S. Multinational Energy-Related Firms' Perspective on the Importance of International Accounting and Taxation Topics 510

Leftwich, Richard H.
Court Errors in the Use of Internal Rates of Return in the Valuation of Helium 745
The Workback Method of Valuing Raw Materials: The Helium Cases 292

Licata, Michael P.
Texas Severance Tax and Sulphur Production 111

Maloney, David M.
An Intervention Analysis of the Effectiveness of the Investment Tax Credit 318

McNiel, Douglas W.
New Superfund Legislation: Major Provisions, Revenue Sources, and Economic Incentives for Environmental Protection 610

Mister, William G.
The Politicization of Oil and Gas Accounting 122

Moch, Leslie W.
Investment in the Oil and Gas Industry Today 620

Munter, Paul
The Importance of Transfer Pricing to Oil and Gas Companies ... 136

Nichols, Linda
The Politicization of Oil and Gas Accounting....122

Porter, Alan
The Tax Consequences of Exchanging Property Encumbered by Excessive Debt for a Partnership Interest....259

Posey, C.L.
The Case for a Windfall Loss Tax Credit....224

Putnam, Karl B.
How Accounting for Futures Contracts, the Investment Tax Credit, and Software To Be Sold Affect Natural Resource Companies....347

Roe, Steven L
The Tax Reform Act of 1986 As It Affects the Oil and Gas Industry....385

Rolfe, Robert J.
Mineral Extraction and the Alternate Valuation Date....73

Rolfe, Susan L.
Mineral Extraction and the Alternate Valuation Date....73

Russell, Charles W.
Purchase of a Producing Oil and Gas Well: Is Cost of the Cased Shaft Recoverable Through Depreciation?....177

Schnee, Edward J.
Recent Developments in the Deductibility of Oil and Gas Partnership Losses....207

Sena, James A.
Development of Computer Data Base of Financial Ratios to Evaluate Oil and Gas Companies....718

Smith, L. Murphy
Development of Computer Data Base of Financial Ratios to Evaluate Oil and Gas Companies....718
Taxation and Financial Reporting Regarding the Economic-Out Clause....115
U.S. Multinational Energy-Related Firms' Perspective on the Importance of International Accounting and Taxation Topics....510

Stewart, Dave N.
Clark: Has the Tax Court Provided Clarification for the Treatment of Reorganization Boot....489

Sunderman, Norman A.
Delayed Vesting of the Overriding Royalty and Rev. Rul. 83-46...484

Thomas, Christopher R.
Manipulating Gross Income from Mining by Integrated Mineral Firms....282

Taxation and Vertical Integration in the Petroleum Industry 274

Vile, John R.
New Superfund Legislation: Major Provisions, Revenue Sources, and Economic Incentives for Environmental Protection 610

Voght, F. Brook
IDC and Enhanced Recovery Method 461

West, Robert J.
How Accounting for Futures Contracts, the Investment Tax Credit, and Software To Be Sold Affect Natural Resource Companies 347

Westin, Richard A.
Relationship Between the Rule Against Perpetuities and the Convertible Override 238

White, Stephen J.
Restoration of Depletion on Oil and Gas Lease Bonuses 585

Worrell, Dan
The Stock Market's Reaction to Key Executive Death in the Oil Industry 533

Yu, Shirley S.
Court Errors in the Use of Internal Rates of Return in the Valuation of Helium 745
The Workback Method of Valuing Raw Materials: The Helium Cases 292